

Internal Revenue Service

Department of the Treasury

Date:

Taxpayer Identification Number:

Name of Plan:

Opinion Letter Number:

Person to Contact/ID Number:

Contact Telephone Number:

Contact Fax Number:

E-mail Address:

Return Reply to:

Dear Sir or Madam:

This letter is being sent to you because our records show that you sponsor a Master and Prototype (M&P) plan and that you applied for an opinion letter pursuant to Revenue Procedure 2000-20. This letter constitutes a compliance check. A compliance check is not an audit or investigation under Internal Revenue Code (IRC) Section 7605(b) or an audit under Section 530 of the Revenue Act of 1978.

Applying for a GUST opinion letter was subject to your agreement to comply with the requirements imposed on sponsors by Revenue Procedure 2000-20. Failure to comply with those requirements may result in the loss of eligibility to sponsor an M&P plan and the revocation of opinion letters that have previously been issued to you.

The IRS has estimated that at least 90% of all qualified plans are Master and Prototype or Volume Submitter plans; the two types of pre-approved plans. Results from examinations have revealed a need to more closely monitor pre-approved plans. The practitioner community has also provided feedback to us expressing concern with the level of service provided by pre-approved plan sponsors in relation to their adopting employers.

Please provide the information and documentation described in the attached Request for Information within 21 days from the date of this letter. Failure to provide this information could result in further action. You may also furnish any other documents or clarifying material that you believe will be helpful for us to review.

As part of our Request for Information, we ask that you provide a list of employers that have adopted your M&P plan. Revenue Procedure 2000-20 allows us to ask for this information. As part of the compliance check, a sample of those employers will then be contacted.

We are also interested in hearing your comments regarding the M&P compliance project and its impact on your firm, your clients and overall pension compliance. If you would like someone else to represent the plan during this compliance check, you must submit a written power of attorney. Form 2848, *Power of Attorney and Declaration of Representative*, may be used for this purpose.

You may obtain additional information about the Employee Plans Compliance Unit, compliance checks, our current compliance projects, and a list of frequently asked questions by visiting our website at www.irs.gov/ep. If you have any questions, please feel free to contact me at the telephone number listed on page 1 or e-mail us and we will be glad to answer any questions you have about the M&P Project and how it relates to your situation.

Thank you for your cooperation.

Sincerely,

Enclosure:

Request for Information (*page 3 of this letter*)

Request for Information

1. Provide a list of employers that have adopted your M&P plan including their business and e-mail addresses, telephone number and Taxpayer Identification Number. Indicate which employers have ceased to maintain the plan as an M&P plan within the last three years.
2. Do you continue to maintain the M&P plan as an M&P plan? If no, please explain why not.
3. Send copies of the approved GUST M&P plan, opinion letter and all subsequent amendments (*including 'Good Faith' EGTRRA Amendments*) provided to adopting employers up to March 7, 2005, including any instructions provided to adopting employers to aid them in the adoption and amendment process.
4. Provide an explanation and documentation of the efforts made to ensure that adopting employers have received and are aware of all documents regarding plan adoption and amendment.
5. Provide an explanation and documentation of the efforts made to ensure that adopting employers have completed and signed new adoption agreements or signature pages when necessary.
6. Provide an explanation and documentation of the efforts made to ensure that adopting employers timely amend their plans when necessary.
7. Provide an explanation and documentation of the efforts made to ensure that adopting employers continue to maintain their plan as an M&P plan.
8. Provide an explanation of how your business administers the M&P process, including information and documentation on how you monitor compliance with Revenue Procedure 2000-20. Please make sure to separately address the communications process including how you monitor the sending and receiving of materials to and from your adopting employers.
9. Please provide us with feedback, including both adverse and positive comments on the M&P compliance project and its impact on your firm, your clients and overall pension compliance.

Note: If you want to send any portion of your response in electronic format (ASCII, Excel, Access, Text File or other media contact) please contact us for additional instructions. The contact information is located on page 1.